

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. Grace & Co., <u>et al.</u> ,	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
	)	
Debtors.	)	

**MOTION TO LIMIT AND SHORTEN NOTICE  
AND FOR EXPEDITED HEARING**

The ZAI Claimants, by and through its undersigned counsel, hereby move this Court for the entry of an Order, pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure and Section 102 of the Bankruptcy Code, limiting and shortening notice and granting an expedited ZAI Claimants' Motion to Compel filed simultaneously herewith.

Pursuant to Rule 9006-1 of the Local Rules of Bankruptcy Procedure, service of discovery related motions is to be made at least 5 business days prior to the hearing, with responses due the day prior to the hearing. In this case, service of the Motion to Compel will be made 3 business days prior to the hearing, via facsimile and hand delivery or overnight mail. The ZAI Claimants respectfully request that the Motion to Compel be considered at the September 23, 2002 hearing before the Court because: (1) the ZAI Science Trial is being conducted under an abbreviated time frame, with expert reports due in four months time from the date of this motion, such that a month delay in the consideration of this Motion (until the next omnibus date) will severely prejudice the ZAI Claimants' ability to conduct discovery and adequately prepare for the ZAI Science Trial, and (2) the discovery disputes have been fully outlined by letters between the parties, such that a shortened time frame should not prejudice the Debtors ability to respond to

the issues to be presented to the Court.

WHEREFORE, the ZAI Claimants respectfully requests the entry of an order shortening the notice period on the ZAI Claimants' Motion to Compel and granting an expedited hearing on the Motion to Compel.

Dated: September 18, 2002  
Wilmington, Delaware

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	)	(Jointly Administered)
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Debtors.	)	

**ORDER GRANTING MOTION FOR EXPEDITED HEARING**

The foregoing Motion to Limit and Shorten Notice and for Expedited Hearing is hereby GRANTED.

A hearing on the Zonolite Claimants' Motion to Compel shall be held on September 23, 2002 at 10:00 a.m.

SO ORDERED this \_\_\_\_\_ day of September, 2002.

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The Honorable Judith K. Fitzgerald  
United States Bankruptcy Judge